

In re:	)	
	)	PROMESA
THE FINANCIAL OVERSIGHT AND	)	Title III
MANAGEMENT BOARD FOR PUERTO RICO	)	
	)	Case No. 3:17-bk-03566 (LTS)
as representative of	)	
	)	
THE EMPLOYEES RETIREMENT SYSTEM OF THE	)	
GOVERNMENT OF THE COMMONWEALTH OF	)	
PUERTO RICO,	)	
	)	
Debtor.	)	

**HEARING EXHIBIT LIST OF CERTAIN SECURED CREDITORS  
OF THE EMPLOYEES RETIREMENT SYSTEM OF THE  
GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO**

The Debtors in these Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474), and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747).

Pursuant to the Court's *Order Granting Urgent Joint Motion Regarding the Scheduling of Discovery and Briefing in Connection with the Motion of Certain Secured Creditors of the Employees Retirement System of the Government of the Commonwealth of Puerto Rico for Relief from the Automatic Stay* [Docket No. 505 in Case No. 17-3566], Movants,<sup>2</sup> by and through their undersigned counsel, hereby respectfully submit their Hearing Exhibit List. As of the date of this filing, discovery is still ongoing in this matter. Movants therefore reserve the right to amend this Exhibit List as further facts are revealed through discovery.

As of the date of this disclosure, Movants expect to introduce the following exhibits into evidence at the final hearing:

EX. NO.	DESCRIPTION	DEP. EX / BATES
1.	ERS Bond Resolution, dated January 24, 2008	BNYM00001
2.	ERS Basic Financial Statements and Required Supplementary Information, dated June 30, 2014	Yassin-Mohammad Ex. 3
3.	Commonwealth of Puerto Rico Financial Information and Operating Data Report, dated December 18, 2016	Collazo Rodriguez Ex. 4 Pena-Montanez Ex. 4 Yassin-Mohammad Ex. 4
4.	Letter from Oversight Board to Governor Alejandro Garcia Padilla re: Assessment of Fiscal Plan, dated November 23, 2016	Collazo Rodriguez Ex. 5 El Koury Ex. 4 Pena-Montanez Ex. 5 Yassin-Mohammad Ex. 5
5.	Commonwealth Fiscal Plan, dated February 28, 2017	Collazo Rodriguez Ex. 6 El Koury Ex. 6 Pena-Montanez Ex. 6 Yassin-Mohammad Ex. 6
6.	Certified translation of House Joint Resolution 188	Collazo Rodriguez Ex. 8 Pena-Montanez Ex. 8 Yassin-Mohammad Ex. 8

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<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the *Motion of Certain Secured Creditors of the Employees Retirement System of the Government of the Commonwealth of Puerto Rico for Relief from the Automatic Stay* [Docket No. 289 in Case No. 17-3566].

7.	Draft Memorandum of Understanding between the Commonwealth, ERS, and AAFAF re: Payment of Pension and Other Benefits	El Koury Ex. 10 Pena-Montanez Ex. 9 Yassin-Mohammad Ex. 9 ERS-CW_LS0000309-313
8.	Certified translation of Law No. 106	El Koury Ex. 12 Pena-Montanez Ex. 10 Yassin-Mohammad Ex. 10
9.	Commonwealth Fiscal Plan, dated October 14, 2016	Collazo Rodriguez Ex. 11 El Koury Ex. 3 Pena-Montanez Ex. 11 Yassin-Mohammad Ex. 11
10.	Letter from Milliman to Yassin Mohammad re: Administrative Expenses Summary, dated December 20, 2017	Yassin-Mohammad Ex. 12 CW_RJM2004_0018462- CW_RJM2004_0018465
11.	Puerto Rico Treasury Department Circular Letter No. 1300-46-17, dated June 27, 2017	Collazo Rodriguez Ex. 38 El Koury Ex. 11 Pena-Montanez Ex. 13 Yassin-Mohammad Ex. 13
12.	Certified translation of SB1258	Yassin Ex. 14 Pena Ex. 14 El Koury Ex. 14
13.	Commonwealth Fiscal Plan, dated May 9, 2019	El Koury Ex. 16 Yassin-Mohammad Ex. 15
14.	AAFAF Presentation on PayGo Payments and Individual Contributions Debt by Entity, dated December 31, 2017	Yassin-Mohammad Ex. 16 CW_RJM2004_0009937- CW_RJM2004_0009953
15.	AAFAF Presentation on PayGo Payments and Individual Contributions Debt by Entity, dated June 30, 2018	Yassin-Mohammad Ex. 17 ERS_BH_002892
16.	Letter from Oversight Board to Commonwealth Chief Financial Officer Maldonado Gautier and ERS Executive Director Collazo Rodriguez re: Latest PayGo and Individual Contribution Debt by Entity, dated April 30, 2019	Collazo Rodriguez Ex. 18 El Koury Ex. 15 Pena-Montanez Ex. 18 Yassin-Mohammad Ex. 18
17.	AAFAF Presentation on PayGo Payments and Individual Contributions Debt by Entity, dated June 30, 2018	El Koury Ex. 13 Yassin-Mohammad Ex. 19 ERS_LS0000745-767
18.	Commonwealth Revised Baseline Projections, dated December 20, 2016	Collazo Rodriguez Ex. 21 Pena-Montanez Ex. 21

19.	Commonwealth Fiscal Plan, dated March 13, 2017	Collazo Rodriguez Ex. 22 El Koury Ex. 5 Pena-Montanez Ex. 22
20.	Oversight Board Resolution Adopted on March 13, 2017 (Fiscal Plan Certification)	Collazo Rodriguez Ex. 23 El Koury Ex. 9 Pena-Montanez Ex. 23
21.	Commonwealth Fiscal Plan, dated March 13, 2017 (conformed to include amendments, corrections, and an exhibit)	Pena-Montanez Ex. 24
22.	E-mail from Omar E. Rodriguez Perez to Gilberto Reyes Malave and Others re: Pay Go, dated July 7, 2017	Collazo Rodriguez Ex. 25 Pena-Montanez Ex. 25 ERS-CW_LS0000304
23.	Puerto Rico Treasury Department Circular Letter No. 1300-46-17, dated June 27, 2017 (Spanish version)	Collazo Rodriguez Ex. 26 Pena-Montanez Ex. 26 ERS-CW_LS0000305
24.	Presentation from Puerto Rico Secretary of Public Affairs and Public Policy Ramon L. Rosario Cortes on Transformation of the Retirement Systems, dated July 25, 2017	Pena-Montanez Ex. 27 ERS_LS0005105-ERS_LS0005118
25.	Letter from AAFAF to Luis M. Collazo Rodriguez re: House Joint Resolution 188, dated July 19, 2017	Collazo Rodriguez Ex. 28 El Koury Ex. 8 Pena-Montanez Ex. 28 ERS-AAFAF_LS0001280
26.	E-mail from Brian P. Biggio (Conway MacKenzie) to Francisco Pena Montanez re: FY18 Budgeted Pay-Go by Agency, dated September 11, 2017	Pena-Montanez Ex. 29 ERS-CW_LS0000397 and ERS-CW_LS0000398
27.	Government Committee Presentation on Status of the Trusts of the Government Employees Retirement System and the Judiciary Retirement System, dated March 15, 2017	Pena-Montanez Ex. 31 ERS_LS0005068
28.	Employees Retirement System of the Government of the Commonwealth of Puerto Rico Basic Financial Statements and Required Supplementary Information, dated June 30, 2016	Collazo Rodriguez Ex. 34
29.	Letter from Milliman to Luis M. Collazo Rodriguez re: Third Addendum to June 30, 2016 PRGERS Valuation Report to Reflect Updated Assets, dated October 23, 2018	Collazo Rodriguez Ex. 35
30.	Milliman ERS Actuarial Valuation Report June 30, 2017	Collazo Rodriguez Ex. 36

31.	Offering Memorandum for \$1,588,810,799.70 Employees Retirement System of the Government of the Commonwealth of Puerto Rico Senior Pension Funding Bonds, Series A	Collazo Rodriguez Ex. 37 BH-ERS-C-002670
32.	Puerto Rico Treasury Department Circular Letter No. 1300-46-17, dated June 27, 2017	Collazo Rodriguez Ex. 38 ERS-CW_LS0000305
33.	ERS Presentation on Implementation of the “PayGo” Retirement Payment System, dated June 29, 2017	Collazo Rodriguez Ex. 39 ERS_LS0005056-ERS_LS0005065
34.	Memorandum of Understanding between the Commonwealth, ERS, and AAFAF re: Payment of Pension and Other Benefits	Collazo Rodriguez Ex. 40 ERS_LS0006237-ERS_LS0006241
35.	Letter from Government of Puerto Rico to Banco Popular Requesting Transfer on Account of Liquidation of Assets of ERS, dated July 25, 2017	Collazo Rodriguez Ex. 41 ERS-AAFAF_LS001506-ERS-AAFAF_LS001507
36.	Summary of Funds in Pre-Petition Segregated Account (Banco Popular Account No. 030-067944) and Transfers to and from Account Since January 2017	Collazo Rodriguez Ex. 42
37.	Compilation of Bank Statements Produced by ERS for Pre-Petition Segregated Account (Banco Popular Account No. 030-067944)	Collazo Rodriguez Ex. 43 ERS_LS0002841- ERS_LS0002891
38.	Summary of Funds in ERS Operational Account (Banco Popular Account No. 030-051177) and Transfers to and from Account Since Petition Date	Collazo Rodriguez Ex. 44
39.	Compilation of Bank Statements Produced by ERS for ERS Operational Account (Banco Popular Account No. 030-051177)	Collazo Rodriguez Ex. 45 ERS_LS0002050- ERS_LS0002249
40.	Fiscal Plan Amendments Summary, dated March 13, 2017	El Koury Ex. 7
41.	E-mail from Adam Chepenik (Ernst & Young) to Gerardo Portela Franco re: ERS Pensions, dated May 26, 2017	El Koury Ex. 17 ERS-AAFAF_LS0001529
42.	Minutes from the first meeting of the Oversight Board on September 30, 2016	
43.	Press Release issued by the Oversight Board on December 20, 2016 re Revisions to Baseline Projections	
44.	December 20, 2016 Letter from the Oversight Board to then-Governor García Padilla and Governor-Elect Rosselló Nevares re Revisions to Baseline Projections	

45.	January 18, 2017 Letter from the Oversight Board to Governor Rosselló Nevares	
46.	ERS Annual Financial Information and Operating Data Report for Fiscal Year 2018, dated May 1, 2019	
47.	Milliman ERS Actuarial Valuation Report, June 30, 2014	
48.	Milliman ERS Actuarial Valuation Report, June 30, 2015	
49.	ERS Basic Financial Statements and Required Supplementary Information, June 30, 2015	
50.	ERS Annual Financial Information, Fiscal Year 2016, dated April 25, 2017	
51.	AAFAF Summary of Bank Account Balances for the Government of Puerto Rico and its Instrumentalities, dated April 30, 2019	
52.	ERS Schedules of Employer Allocations, June 30, 2016 and 2015	
53.	AAFAF Summary of Bank Account Balances for the Government of Puerto Rico and its Instrumentalities: Information as of June 30, 2018, dated July 24, 2018	
54.	Report by U.S. Government Accountability Office, “State and Local Government Retiree Benefits: Current Status of Benefit Structures, Protections, and Fiscal Outlook for Funding Future Costs”	
55.	Excerpts of Deposition Transcript Mohammad Yassin Mahmud (May 29, 2019)	
56.	Excerpts of Deposition Transcript Francisco Pena Montanez (May 30, 2019)	
57.	Excerpts of Deposition Transcript Luis Collazo Rodriguez (June 4, 2019)	
58.	Excerpts of Deposition Transcript Jaime El Koury (June 6, 2019)	
59.	Excerpts of Deposition Transcript Andrew Samwick (June 17, 2019)	
60.	Excerpts of Deposition Transcript Faten Sabry (June 20, 2019)	
61.	Excerpts of Deposition Transcript Gaurav Malhotra (June 18, 2019)	
62.	Excerpts of Deposition Transcript Lawrence Sher (June 20, 2019)	
63.	Expert Report of Andrew A. Samwick, Ph.D., dated May 30, 2019	

64.	Curriculum vitae of Andrew A. Samwick	
65.	Expert Report of Faten Sabry, Ph.D., dated May 30, 2019	
66.	Curriculum vitae of Faten Sabry	
67.	Rebuttal Expert Report of Faten Sabry, Ph.D., dated June 12, 2019	
68.	Letter from Oversight Board to Mitchell McConnell, Jr., Paul Ryan, Jr., Charles Schumer, and Nancy Pelosi re: Independent Representation of Title III Debtors, dated March 12, 2018	
69.	Employees Retirement System of the Government of the Commonwealth of Puerto Rico Annual Financial Information for Fiscal Year 2017	
70.	AAFAF Presentation on PayGo Payments and Individual Contributions Debt by Entity dated April 15, 2019	
71.	March 14, 2019, news article from Reorg Research, Inc. titled Gov. Rosselló Warns Fiscal Challenges Will Make Some Municipalities Inoperable Within 5 Years Absent Structural Reform, Acknowledges Opposition to County Plan	
72.	March 15, 2019, news article from Reorg Research, Inc. titled Gov. Rosselló Says Administration Will File Legislation to Create County System of Government, Cites Potential Annual Savings Between \$600M and \$1B	
73.	Press Release Oversight Board Calls for Urgent Action to Collect \$340 Million due from Municipalities and Public Corporations in PayGo and Individual Employee Payroll Withholdings	
74.	Law No. 177	
75.	Municipality of Ponce Audit Report (Mar. 4, 2019)	
76.	El Nuevo Dia article titled Mayors denounce errors in the PayGo (Jul. 27, 2018)	
77.	May 9, 2019, Letter from the Oversight Board to Governor Rosselló re designation of municipalities	
78.	Act 29-2019	

79.	May 17, 2019, Letter from the Oversight Board to Governor Rosselló, the President of the Senate of Puerto Rico and the Speaker of the House of Representatives of Puerto Rico re SB 1258	
80.	UCC Financing Statements and Security Agreement Package	
81.	Article titled San Juan Mayor Discusses Order in Local Pay-Go Lawsuit, Skips Oversight Board Meeting at CRIM Based on City's Pending Lawsuit Against Board published by Reorg Research, Inc. and dated June 11, 2019.	
82.	May 29, 2019, municipality of San Juan Sworn Complaint against the ERS, the Puerto Rico Treasury Department, the Retirement Board of the Government of Puerto Rico and the heads of the entities in their official capacity in the San Juan Court of First Instance	
83.	June 10, 2019, Motion to Dismiss and, In the Alternative, In Opposition to Preliminary and Permanent Injunction and Mandamus Petition in municipality of San Juan suit in Court of First Instance	
84.	June 12, 2019, Oversight Board Letter to Governor Rosselló, President of the Senate Schatz, and Speaker of the House Núñez re Act 29	
85.	Fiscal board to send lawmakers its own version of Puerto Rico's budget, <a href="https://caribbeanbusiness.com/fiscal-board-to-send-lawmakers-its-own-version-of-puerto-ricos-budget/">https://caribbeanbusiness.com/fiscal-board-to-send-lawmakers-its-own-version-of-puerto-ricos-budget/</a> (May 28, 2019)	
86.	Oversight Board to Present \$9.1B Fiscal 2020 General Fund Budget to Legislature, Reorg Research, Inc. (May 28, 2019)	
87.	Unofficial Transcript, Altair Global Credit Opportunities Fun (A), LLC, et al., v. Garcia-Padilla, et al., No. 16-2433	
88.	AAFAF Report on PayGo Payments and Individual Contributions Debt by Entity 1/31/2019	ERS_LS0000690
89.	Email from Cecile Tirado Soto to Luis Collazo Rodriguez re: PayGo Retirement, dated May 5, 2017	ERS_LS0005066



90.	Email from Fernando Scherrer to Mauricio Sanchez re: PayGo Pension Analysis, dated May 20, 2017	ERS_LS0007599
91.	Email from Jorge Aponte Hernandez to Mauricio Sanchez re: Draft PayGo Analysis, dated June 2, 2017	ERS_LS0008173
92.	Email from Fernando Scherrer to William Fornia re: PayGo Pension Analysis, dated May 29, 2017	ERS_LS0008185
93.	Email from Fernando Scherrer to Adam Chepenik re: PayGo Pension Analysis, dated May 21, 2017	ERS_LS0008249
94.	Report Listing Paygo but breaking out Employer Contributions	ERS_LS0008279
95.	ERS Presentation on PayGo Delinquencies, dated July 28, 2017	ERS_LS0009262
96.	Letter from Robert A. Longfield, Jr. (Gavion) to Luis Collazo Rodriguez re: Recommendation to Liquidate ERS Assets, dated July 14, 2017	ERS_LS0009282
97.	Letter from Gerardo Jose Portela Franco to Juan M. Medina Colon re: Liquidation of ERS, dated August 25, 2017	ERS-AAFAF_LS0001139
98.	Email from Carlos M. Yamin Rivera to Luis Collazo Rodriguez re: Liquidation of ERS Assets, dated July 19, 2017	ERS-AAFAF_LS0001279
99.	Email from Adam Chepenik to Gerardo Portela Franco re: ERS Pensions Transition to PayGo, dated May 26, 2017	ERS-AAFAF_LS0001520
100.	Email from Maria Gonzalez Garay to Gerardo Portela Franco re: Progress Update on Budget Process, dated April 21, 2017	ERS-AAFAF_LS0001523
101.	Agenda for Discussion for AAFAF Meeting	ERS-AAFAF_LS0001694
102.	Email from Glenn Bowen (Milliman) to Jesus Mattei Perez (AAFFA) re: Actuarial PayGo, dated May 3, 2017	ERS-AAFAF_LS0001698
103.	ERS Form of Requisition for Payment to Bank of New York	ERS-AAFAF_LS0001995
104.	Email from Luis Collazo Rodriguez to Francisco Pena Montanez re: Joint Stipulation Order, dated August 29, 2017	ERS-CW_LS0000026
105.	Oversight Board Explanatory Memorandum on Pension Reform, dated August 4, 2017	ERS-CW_LS0000232
106.	Email from Francisco Pena Montanez to Mauricio Sanchez re: Pensions FY18, dated July 15, 2017	ERS-CW_LS0000344

107.	Email communication Conway Mackenzie, AAFAF, Treasury Department, and ERS	ERS-CW_LS0000386
108.	Milliman letter re PRERS Estimated Projected Benefit Payments reflecting Act 106-2017, dated December 8, 2017	MALHOTRA00000003
109.	Milliman letter re PRERS Estimated Projected Benefit Payments reflecting Act 106-2017– Agencies Covered by Fiscal Plan Only, dated December 21, 2017	MALHOTRA000000098
110.	Milliman letter re PRERS Estimated Projected Benefit Projection Payments, dated April 4, 2019	MALHOTRA000000081
111.	Malhotra Excel Spreadsheet with NPV Calculations	MALHOTRA000000179
112.	ERS Amended and Restated First Supplemental Pension Funding Bond Resolution Authorizing Senior Pension Funding Bonds Series A, dated January 29, 2008	
113.	Brief in Opposition to Motion for Relief From the PROMESA Automatic Stay filed by the Employees Retirement System of the Government of the Commonwealth of Puerto Rico’s	Altair Global Credit Opportunities Fund (A), L.L.C., et al. v. Governor Alejandro García Padilla, et al., No. 16-cv-2696, Dkt. 52 (Oct. 26, 2016)
114.	Brief in Opposition to Motion for Relief From the PROMESA Automatic Stay filed by the Commonwealth of Puerto Rico	Altair Global Credit Opportunities Fund (A), L.L.C., et al. v. Governor Alejandro García Padilla, et al., No. 16-cv-2696, Dkt. 53 (Oct. 26, 2016)
115.	Brief for the Employees Retirement System of the Government of the Commonwealth of Puerto Rico	First Circuit in Case No. 16-2433 (1st Cir. Dec. 23, 2016)
116.	Brief for Alejandro Garcia-Padilla (then-Governor of Puerto Rico), Juan C. Zaragoza-Gomez (then-Secretary of Treasury of Puerto Rico), Luis G. Cruz-Batista (Director of the Puerto Rico Office of Management and Budget), and Carmen Villar-Prados (then-Executive Director of the Puerto Rico Highways and Transportation Authority)	First Circuit in Case No. 16-2433 (1st Cir. Dec. 23, 2016)
117.	Brief of Amicus Curiae Financial Oversight and Management Board for Puerto Rico in Support of Respondents-Appellees Urging Affirmance of the District Court Order	First Circuit in Case No. 16-2433 (1st Cir. Dec. 23, 2016)
118.	Milliman ERS Actuarial Valuation Report, June 30, 2007	

119.	Milliman ERS Actuarial Valuation Report, June 30, 2009	
120.	Milliman ERS Actuarial Valuation Report, June 30, 2010	
121.	Milliman ERS Actuarial Valuation Report, June 30, 2011	
122.	Milliman ERS Actuarial Valuation Report, June 30, 2012	
123.	Milliman ERS Actuarial Valuation Report, June 30, 2013	
124.	ERS Basic Financial Statements and Required Supplementary Information, June 30, 2009	
125.	ERS Basic Financial Statements and Required Supplementary Information, June 30, 2010	
126.	ERS Schedules of Employer Allocations, June 30, 2014 and 2013	
127.	ERS Schedules of Employer Allocations, June 30, 2015 and 2014	
128.	Report by Board of Governors of Federal Reserve System, "State and Local Government Pension Funding Ratios, 2002 – 2016"	
129.	Summary of Bank Account Balances for the Government of Puerto Rico and Its Instrumentalities as of November 30, 2018	ERS_LS0000232
130.	ERS Circular Letter No. 2019-01 from Luis Collazo re: Employer and Individual Contributions Pursuant to Act 70 of July 2, 2010 and Act 211 of December 8, 2015, dated August 29, 2018	ERS_LS0001815
131.	Office of Public Finance Circular Letter No. 2019-01 from Raul Maldonado Gautier re: Pay-Go Fee Payments, dated September 4, 2018	ERS_LS0001820
132.	ERS and TRS Assets and Investments	ERS_LS0006259
133.	ERS Chart of Operational Account and PayGo Restructuring Account for May 2017– July 2017	ERS_LS0009213
134.	Letter from Gerardo Portela Franco to Maria de Lourdes Ramos re: PayGo Legislation, dated August 1, 2017	ERS-AAFAF_LS0001508
135.	Letter from Gerardo Portela Franco to Miguel Romero re: PayGo Legislation, dated August 1, 2017	ERS-AAFAF_LS0001514

136.	Moody's Investors Service Report on Downgrade of Puerto Rico Bonds, dated April 5, 2017	ERS-AAFAF_LS0001558
137.	Pension Related Inflows and Outflows for Reconciliation between Consolidated Budget and TSA Cash Flow Projections for FY2018	ERS-CW_LS0000296
138.	Oversight Board Pre-Read February 16/17 Board Presentation, dated February 19, 2017	FOMB_ERS_00000286
139.	Oversight Board FY18 Recommended Budget, dated June 2, 2017	FOMB_ERS_00000656
140.	Fiscal Projections for Puerto Rico Government and Instrumentalities	FOMB_ERS_00009108
141.	Projected Cash Flows Before Cliffs, Measures, and Debt for Puerto Rico Government and Instrumentalities	FOMB_ERS_00009109
142.	Projected Expenses for Puerto Rico Government	FOMB_ERS_00009460
143.	The Commonwealth of Puerto Rico's Responses and Objections to ERS Bondholders' Amended Interrogatories, produced on April 23, 2019	
144.	The Employees Retirement System of the Government of the Commonwealth of Puerto Rico's Responses and Objections to ERS Bondholders' Amended Interrogatories, produced on April 23, 2019	